

James S. Bell (252662)  
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Attorney for Defendants

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

MATTHEW H. PETERS, BAYVIEW  
SPECIALTY SERVICES LLC,  
COASTLINE SPECIALTY  
SERVICES LLC, STRAND VIEW  
CORPORATION, INNOVATIVE  
SPECIALTY SERVICES LLC,  
PARAGON PARTNERS LLC (D/B/A  
PARAGON MEDICAL PARTNERS),  
CARDEA CONSULTING LLC, PRAXIS  
MARKETING SERVICES LLC,  
PROFESSIONAL RX PHARMACY LLC,  
INLAND MEDICAL CONSULTANTS  
LLC (D/B/A ADVANCED  
THERAPEUTICS), PORTLAND  
PROFESSIONAL PHARMACY LLC,  
SUNRISE PHARMACY LLC,  
PROFESSIONAL 205 PHARMACY LLC  
(D/B/A PROFESSIONAL CENTER  
205 PHARMACY), SYNERGY  
MEDICAL SYSTEMS LLC (D/B/A  
SYNERGY RX), SYNERGY RX LLC  
(D/B/A SYNERGY RX), PRESTIGE  
PROFESSIONAL  
PHARMACY, JMSP LLC (D/B/A  
PROFESSIONAL CENTER 205  
PHARMACY), MPKM, LLC (D/B/A

Case No. 2:24-cv-00287-CKD

**DEFENDANTS' MOTION FOR  
RECONSIDERATION OF ORDER (ECF  
No. 23)**

PROFESSIONAL CENTER  
PHARMACY), ONE WAY DRUG LLC  
(D/B/A PARTELL PHARMACY),  
PARTELL PHARMACY LLC,  
OPTIMUM CARE PHARMACY INC.  
(D/B/A MARBELLA PHARMACY),  
GLENDALE PHARMACY LLC, and  
LAKE FOREST PHARMACY (D/B/A  
LAKEFOREST PHARMACY),

Defendants.

1 Defendants Matthew Peters; JMSP, LLC; Paragon Partners, LLC; Innovative Specialty  
2 Services, LLC; Cardea Consulting, LLC; Coastline Specialty Services, LLC; Portland Professional  
3 Pharmacy, LLC; Sunrise Pharmacy, LLC; Professional 205 Pharmacy, LLC; Lake Forest  
4 Pharmacy, LLC; Bayview Specialty Services, LLC; Praxis Marketing Services, LLC; Prestige  
5 Professional Pharmacy, LLC; Optimum Care Pharmacy, Inc.; and Glendale Pharmacy, LLC  
6 (“Defendants”) move this Honorable Court to reconsider the Order (ECF No. 23) that struck the  
7 Defendants’ Motion to Dismiss (ECF No. 21).

8 The undersigned entered a Notice of Appearance for Defendant Peters on April 18, 2024.  
9 (ECF No. 7). The undersigned entered a Notice of Appearance for the remaining Defendants on  
10 April 25, 2024. (ECF No. 9). On May 6, 2024, the Defendants filed a Motion to Dismiss. (ECF  
11 No. 21). On May 8, 2024, Honorable Magistrate Judge Delaney entered an Order striking the  
12 Defendants’ Motion to Dismiss “because [the undersigned] is not admitted to practice in this  
13 Court.” However, the undersigned is admitted to practice in this Honorable Court and has been  
14 since December 8, 2022. *See* Exhibit A.

15 Because of this, the Defendants respectfully request this Honorable Court to reconsider the  
16 Order (ECF No. 21) to the extent it strikes the Defendants’ Motion to Dismiss and directs the  
17 undersigned to file an application to practice pro hac vice and pay the applicable fee. Defendants  
18 will submit the Consent/Decline Designation regarding the jurisdiction of the Magistrate Judge  
19 within fourteen (14) days of the Order as requested by this Honorable Court.

20 Dated: May 8, 2024

21 JAMES S. BELL, P.C.

22 /s/James S. Bell

23 James S. Bell

24 State Bar No. 252662

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Dallas, TX 75204

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27 *Attorney for Defendants*

**PROOF OF SERVICE**

**United States of America v. Matthew H. Peters, et al.**  
**Case No. 2:24-cv-00287-CKD**

**STATE OF TEXAS, COUNTY OF DALLAS**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Dallas, State of Texas. My business address is 2808 Cole Avenue, Dallas, TX 75204. On May 8, 2024, I served true copies of the following document(s) described as **DEFENDANTS' MOTION FOR RECONSIDERATION OF ORDER (ECF No. 23)** on the interested parties in this action as follows:

David A. Theiss  
Assistant United States Attorney  
Steven Tennyson  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
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*Attorneys for the United States of America*

**X BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 8, 2024, at Dallas, Texas.

/s/ Connor Nash  
Connor Nash

# Exhibit A

## Attorney LookUp

Last Name\*:

First Name (optional):

Total: 2

Name	Bar Number	Office	City	Bar Status	Admission Date
<b>Bell, James</b>	252662	James S. Bell, P.C.	Dallas	Active	12/08/2022
<b>Bell, James M</b>		Caswell Bell and Hillison LLP	Fresno	Active	03/24/1967